

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

April 7, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, *et al.*
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Chen:

This office, along with Milman Labuda Law Group PLLC, represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case. Plaintiff writes in accordance with this Court's March 31, 2025 Memorandum & Order to respectfully submit a proposed Court-Authorized Notice and cover letter.

This Court previously permitted a similar Court-Authorized Notice and cover letter to be submitted to Plaintiff's customers. See ECF Docket Entries [190](#), [194-1](#), and Text Only Orders dated April 10, 2023 and April 19, 2023.

In light of Plaintiff's early submission of these notices, Plaintiff respectfully requests that Defendants as well as non-parties IME Legal Reps and Eugene Liddie respond within seven (7) days from today with any objections.

Plaintiff thanks this honorable Court for its continued time and attention to this case.

Dated: Lake Success, New York
April 7, 2025

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC
/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York
April 7, 2025

SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.

cc: All Counsel of Record (via ECF)